

COHEN & GREEN

May 30, 2023

Hon. Edgardo Ramos, U.S.D.J.
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 1000

By Electronic Filing.

Re: Sharma v. City of New York, Case No. 21-cv-10892 (ER)(BCM)

Dear Judge Ramos:

I am co-counsel for Plaintiff in the above-captioned matter. I write, jointly with Defendants regarding the current deadline for the end of discovery in this case. The parties would also ask that the Court treat this letter as the status report required by the Court's November 2, 2022 Minute Order.

At the last status conference, the Court directed that the end of discovery in this case is set for May 30, 2023. As the Court may also remember, this docket is limited to what might be called "individual" discovery on Plaintiff's claims, because *Monell* discovery is coordinated with the consolidated docket in *In re New York City Policing During Summer 2020*, 20-cv-8924. See ECF No. 26. Finally, in the time since the last conference, the Court stayed all discovery (except for a limited issue related to identifying Doe defendants — which has now happened) for several months because Defendants' counsel was serving on a grand jury. See ECF No. 36. Thus, it was only recently that the case became unstayed and the parties began discussing the path forward in earnest.

Since then, the parties have had a productive start to settlement discussions, and may be able to settle the case without further litigation. In light of that, the parties would ask the Court to extend the end of discovery 120 days — making the new deadline Wednesday, September 27, 2023 — so the parties can fully explore settlement, as well as move forward in discovery and resolve any representation issues for the to-be-named Doe Defendants (*see* n. 1, below).

As ever, we thank the Court for its attention to this matter.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

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cc:
All relevant parties by ECF.